REMARKS/ARGUMENTS

Upon entry of the present amendment, claims 19, 22, 23, 24, 25, 27, and 28 will have been amended and all claims are being resubmitted for consideration by the Examiner. In view of the above, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicants would like to thank the Examiner for the detailed Office Action provided.

In the outstanding Official Action, claims 19, 21 and 25-27 were rejected under 35 U.S.C.§103(a) over GUEDALIA et al. (U.S. Patent No. 6,148,333) in view of KRASLAVSKY et al. (U.S. Patent No. 5,537,626). Claim 20 was rejected under 35 U.S.C.§103(a) over GUEDALIA et al. in view of KRASLAVSKY et al., in further view of NAKAO et al. (U.S. Patent Publication No. 2001/0054152). Claims 22, 23, 24 and 28 were rejected under 35 U.S.C.§103(a) over GUEDALIA et al. in view of STEFIK et al. (U.S. Patent Publication No. 2001/0008557).

As noted above, claims 19, 22, 23, 24, 25, 27, and 28 will have been amended for consideration. Applicants respectfully traverse the above rejections based on the pending claims and will discuss the rejection with respect to the pending claims in the present application, as will be set forth hereinbelow. The claims have been amended merely to clarify the subject matter, but not to narrow the scope of the claims.

Applicants' claims 19-21 generally relate to a server connectable to a terminal apparatus and to a first printer via a network. The terminal apparatus is connected to a second printer, and the server is not connected to the second printer. The server includes a first memory that stores

original data without a water-mark, a second memory that stores a water-mark associated with a user ID of a user of the terminal apparatus, and a third memory that stores an access right associated with the user ID. The server has a controller that, when the user requests the server to display the original data on a display of the terminal apparatus by inputting the user ID, transforms the original data into image data, selects the water-mark associated with the user ID, adds the selected water-mark to the image data, and transmits the image data with the selected water-mark to the terminal apparatus. The controller controls the first printer connected to the server to print the original data without the water-mark when the user requests the server to print the transmitted image data and when the access right indicates that the user is permitted to print the original data. Further, the terminal apparatus controls the second printer connected to the terminal apparatus to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data. Claims 25-26 recite a related terminal apparatus. Claim 27 recites a related method.

Applicants' claims 22-24 generally relate to a server connected with a terminal apparatus via a network. The server includes a first memory that stores original data without a water-mark and a second memory that stores a first water-mark associated with a document ID of the original data and with a first user ID indicating a predetermined user, and that stores a second water-mark associated with the same document ID and with a second user ID indicating a plurality of users including the predetermined user. The server includes a controller that, when the user requests the server to display the original data on a display of the terminal apparatus by inputting the document ID and the first user ID, determines whether the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, transforms the original data into image data, selects the first water-mark as a priority with

10

respect to the second water-mark when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, adds the selected first water-mark to the image data, and transmits the image data with the selected first water-mark to the terminal apparatus. Claim 28 recites a related method.

With respect to claims 19-21 and 25-27, GUEDALIA et al. the primary reference relied upon by the Examiner relates to a server that, when it provides image data to a user, determines a mode of display. The server has two policies: a default policy and a privilege policy (col.10, lines 23-67 and col.11, lines 1-57). Under the default policy, a user receives a message stating, for example, that "the image you have requested is not available to you". Or a user receives water-marked images (col.10, lines 47-67 and col.11, lines 1-6). On the other hand, under the privilege policy, for example, a user whose request is within the scope of the user's entitlements receives unmodified image data. However, a user whose request is outside the scope of the user's entitlements receives a water-marked image (col.11, lines 7-11).

However, GUEDALIA et al. fails to disclose a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted to print the original data and, on the other hand, a terminal apparatus controlling a second printer connected to the terminal apparatus (but not to the server) to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data.

Rather, GUEDALIA et al. merely teaches that when access is granted (Fig.2, 270), an image server sends to a user unmodified image data for display (Fig.2, 220) and, on the other hand, when access is denied, the image server sends to the user modified image data (water-

marked image data) for display (Fig.2, 280) (col.11, lines 49-57). In other words, GUEDALIA et al. merely teaches display policies, but does not teach how to control printers.

On the other hand, the present invention recites a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted to print the original data and, on the other hand, terminal apparatus controlling a second printer connected to the terminal apparatus but not to the server to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data.

Thus, the pending claims are clearly distinguished over GUEDALIA et al.

The Office Action cites KRASLAVSKY et al. to remedy the acknowledged deficiencies of GUEDALIA. However, KRASLAVSKY et al. fails to disclose those features noted above which are lacking in GUEDALIA. KRASLAVSKY et al. relates to a system in which a printer is interfaced to a local area network. KRASLAVSKY et al. discloses a system in which a file server 30 is connected to a printer 32 and to a printer 34, the file server 30 is connected to a PC 22 via a LAN bus 6, and the PC 22 is connected to a printer 24 (Fig.1).

However, KRASLAVSKY et al. fails to disclose a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted to print the original data and, on the other hand, the terminal apparatus controlling a second printer connected to the terminal apparatus to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original

12

data. Thus, KRASLAVSKY et al. fails to disclose or teach or supply the admitted shortcomings of GUEDALIA et al.

Rather, as above explained, KRASLAVSKY et al. merely teaches a system in which the file server 30 is connected to the printer 32 and to the printer 34, the file server 30 is connected to the PC 22 via the LAN bus 6, and the PC 22 is connected to the printer 24 (Fig.1). However, KRASLAVSKY et al. fails to teach how to control the printer 32 and the printer 34 connected to the file server 30 and the printer 24 connected to the PC 22, with respect to image data with a water-mark. In other words KRASLAVSKY contains no disclosure regarding watermarks and would thus provide no reason to modify GUEDALIA et al., to control a first printer in the manner recited in the pending claims.

Thus, the recitations of claims 19, 21 and 25-27 are not disclosed, suggested or rendered obvious by the combination of GUEDALIA et al. and KRASLAVSKY et al., whether considered alone or in any proper combination.

Regarding claim 20, NAKAO et al. additionally discloses print log information (records of printing performed previously) (paragraph [0183]). However, NAKAO et al. fails to disclose the above-noted features of, e.g., claims 19 and 27 missing from the references applied thereagainst. Therefore, the features recited in pending claim 20 are not disclosed or rendered obvious over GUEDALIA et al. in view of KRASLAVSKY et al. and NAKAO et al.

Accordingly, each of claims 19-21 and 25-27 are not disclosed, suggested or rendered obvious by the documents applied in the Official Action.

GUEDALIA also fails to disclose the server recited in claims 22, 23, 24 and 28. That is, GUEDALIA et al. teaches that there are two policies: a default policy and a privilege policy. However, one of a default policy and a privilege policy is selected, based on whether or not a

user is authenticated (Fig.2, 230, 240 and 250, and col.11, lines 19-23). In other words, when the user is authenticated, the privilege policy is applied. On the other hand, when the user is not authenticated, the default policy is applied. Thus, in GUEDALIA et al., for example, when the user is authenticated, both the privilege policy and the default policy can not be applied. Therefore, one of the privilege policy and the default policy does not need to have a "priority" with respect to the other.

On the other hand, according to various of the pending claims, when the document ID and the first user ID are input, the first water-mark associated with the first user ID and the second water-mark associated with the second ID can be selected, since the first user ID and the second user ID can indicate a predetermined user. The second user ID indicates a plurality of users, but the plurality of the users includes the predetermined user. Thus, in the present invention, the server "selects" the first water-mark as a "priority" with respect to the second water-mark, when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID.

Thus, GUEDALIA does not disclose the features of, e.g., claims 22, 23, 24 and 28.

The Office Action applies STEFIK et al. to teach the claimed features acknowledged to be lacking in GUEDALIA. In this regard, STEFIK et al. relates to a trusted rendering system for controlling the print of digital work. The trusted rendering system facilitates the protection of rendered digital works and controls the printing of digital works through water-mark information.

However, STEFIK et al. fails to disclose a server that, when the user requests the server to display the original data on a display of the terminal apparatus by inputting the document ID and the first user ID, determines whether the first water-mark and second water-mark are stored

in the second memory with respect to the document ID and the first user ID, transforms the original data into image data, selects the first water-mark as a priority with respect to the second water-mark when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, adds the selected first water-mark to the image data, and transmits the image data with the selected first water-mark to the terminal apparatus.

Rather, STEFIK et al. merely teaches that a water-mark is embedded in a digital work for printing the digital work. In other words, STEFIK et al. does not teach that one of two water-marks can be selected as a priority, based on one user ID as recited.

In this regard, the Examiner asserts in the Official Action mailed on June 15, 2007 that STEFIK et al. discloses having the username in the watermark of a specific document along with other various information such as a document name and place of printing (Fig.6). However, the pending claims do not recite having, in a watermark, a username with the other various information. Rather, various of the pending claims recite selection of a water-mark with respect with a document ID and with a user ID or selection of a water-mark associated with a user ID and with a folder ID.

Thus, STEFIK et al. does not contain any disclosure regarding the server recited in claims 22, 23, 24 and 28. Thus, claims 22, 23, 24 and 28 are not disclosed by STEFIK et al. or the combination of GUEDALIA and STEFIK et al.

Accordingly, Applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections, and an indication of the allowability of all the claims pending in the present application, in due course.

15

Further, pursuant to M.P.E.P. §714.13, Applicant asserts that the present amendment places the application in condition for allowance, or alternatively, in better condition for appeal. Further, the amendments to the claims do not require further search and/or consideration, and no additional claims have been added. Thus, Applicant submits that entry of the presently submitted amendment is appropriate, and respectfully requests the entry of the present amendment.
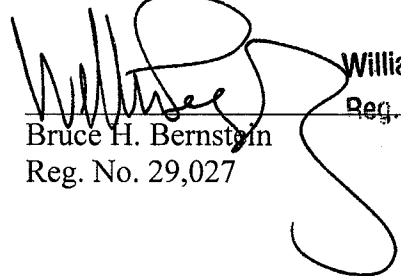
SUMMARY AND CONCLUSION

Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have amended the rejected claims for consideration by the Examiner. With respect to the pending claims, Applicants have pointed out the features thereof and have contrasted the features of the pending claims with the disclosures of the references. Applicants have pointed out the shortcoming of the cited references individually as well as combined by the Examiner, with respect to the recitations of the pending claims. Accordingly, Applicants have provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully request an indication of the allowability of all the claims pending in the present application, in due course.

The amendments to the claims which have been made in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
Takeshi OOTSUKA et al.

William Pieprz
Reg. No. 33,630

Bruce H. Bernstein
Reg. No. 29,027

August 14, 2007
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191

17